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10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16
17 v.
18 JOHNATHAN BUMA,
19 Defendant.

No. CR 25-58-JVS

STIPULATION FOR PROTECTIVE ORDER

20
21 Plaintiff, United States of America, by and through its counsel
22 of record, the Acting United States Attorney for the Central
23 District of California and Assistant United States Attorney David T.
24 Ryan and Trial Attorney Menno Goedman, and defendant Johnathan Buma
25 ("defendant"), by and through his counsel of record, Mark Geragos,
26 Alexandra Kazarian, and Setara Qassim, hereby stipulate and apply to
27 the Court for entry of a protective order pursuant to Rule 16(d)(1),
28 Federal Rules of Criminal Procedure.

1 The bases for this stipulation and request are the following:

2 Stipulated Facts

3 1. On April 17, 2025, defendant was charged in this case by
4 Information with a violation of Title 18, United States Code,
5 Section 1905 (Disclosure of Confidential Information).

6 2. Pursuant to its discovery obligations in this case, the
7 government seeks to disclose to defendant's counsel in discovery
8 certain materials that the government represents contain sensitive
9 information, including information relating to confidential sources
10 of information of the Federal Bureau of Investigation ("FBI");
11 information regarding national security investigations conducted by
12 the FBI; information regarding operationally sensitive law
13 enforcement sources, methods, and techniques; personal identifying
14 information for third party witnesses; and other information that
15 the government represents may have been declassified and that
16 implicates national security and law enforcement sensitive concerns.
17 These materials are collectively referenced below as "Protective
18 Order Material(s)."

19 3. To serve and protect defendant's right to prepare an
20 effective defense in this case, and also to serve the government's
21 interest in protecting sensitive national security and law
22 enforcement information, the parties have stipulated to the entry of
23 a protective order for discovery in this case.

24 Stipulated Conclusions of Law

25 4. Rule 16(d)(1) of the Federal Rules of Criminal Procedure
26 provides that "[a]t any time the court may, for good cause, deny,
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1 restrict, or defer discovery or inspection, or grant other
2 appropriate relief."

3 5. The record demonstrates good cause to permit the Court to
4 exercise its discretion to restrict discovery and inspection of
5 sensitive law enforcement sources, methods, and techniques, as
6 further described below, and to grant such relief as is necessary to
7 ensure the confidentiality of the foregoing information.

8 Requested Protective Order

9 Accordingly, the parties hereby stipulate to this request for
10 the Court to issue a protective order according to the following
11 terms:

12 6. The government may provide to defendant's counsel a copy
13 of any Protective Order Material under the following terms and
14 conditions:

15 a. The government will provide to the Defense Team, as
16 defined below in paragraph 6(f), Protective Order Material(s),
17 redacted if and as appropriate. The government will label the
18 Protective Order Material(s) as being subject to a protective order.

19 b. The Defense Team is permitted to make copies of the
20 Protective Order Material(s) as necessary for the preparation of the
21 defense and for litigation of matters that arise therefrom. The
22 Defense Team shall return all copies of the Protective Order
23 Material(s) to the government, certify that such materials have been
24 destroyed, or certify that such materials are being kept pursuant to
25 the California Business and Professions Code and the Rules of
26 Professional Conduct, at the conclusion of this case and any appeal
27 or post-conviction collateral attack on any conviction or sentence
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1 arising therefrom. The Defense Team shall ensure that defendant
2 does not retain any Protective Order Material(s) or copies thereof
3 after the conclusion of this case and any appeal or post-conviction
4 collateral attack on any conviction or sentence arising therefrom.

5 c. The Defense Team shall maintain all Protective Order
6 Material(s), including any copies, in accordance with this Order.

7 d. The Protective Order Material(s) (whether in physical
8 or electronic form) shall be securely stored at all times by the
9 Defense Team, except while being actively utilized as provided for
10 in this Order.

11 e. A copy of this Order shall be kept with the
12 Protective Order Material(s) at all times.

13 f. The Protective Order Material(s) and its contents
14 shall not be disseminated¹ to the media or posted to the Internet,
15 nor shall the information within Protective Order Material(s) be
16 disclosed in any way to any media source or Internet forum, nor
17 shall the Protective Order Material(s) and its contents be
18 disseminated to any persons, organizations, or other entities, other
19 than the following who must be assisting in the preparation of the
20 defense in this case in order to gain access to any Protective Order
21 Material(s): (i) defendant (under the conditions set forth below);
22 (ii) defendant's counsel of record and supporting members of the
23 defendant's legal team (paralegals, investigators, translators,
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25 ¹ "Disseminated" means to directly or indirectly provide, show,
26 or describe to another (or others) either a particular piece of
27 discovery or quotations, excerpts, or summaries derived therefrom.
28 It includes both physical and virtual sharing of the documents.

1 litigation support personnel, and secretarial staff); and (iii)
2 experts and consultants retained to assist in the preparation of the
3 defense (collectively, the "Defense Team").

4 g. Counsel for defendant shall ensure that any person to
5 whom Protective Order Material(s) have been made available has read
6 the terms of the requested order and agreed to act in accordance
7 with the requested order.

8 h. The Defense Team may show Protective Order
9 Material(s) to third-party witnesses for the sole purpose of
10 preparation of the defense, but may not provide or otherwise
11 disseminate to third-party witnesses copies of Protective Order
12 Material(s).

13 i. Defendant may review Protective Order Material(s) in
14 this case only in the presence of a member of the Defense Team, and
15 defendant's counsel of record shall ensure that defendant is never
16 left alone with any Protective Order Material(s). Defendant may see
17 and review Protective Order Material(s) in the presence of a member
18 of the Defense Team, but defendant may not copy, keep, maintain, or
19 otherwise possess any Protective Order Material(s) in this case at
20 any time. Defendant must return any Protective Order Material(s) to
21 the Defense Team at the conclusion of any meeting at which defendant
22 is permitted to view the Protective Order Material(s). Defendant
23 may not take any Protective Order Material(s) out of the room in
24 which defendant is meeting with the Defense Team. Defendant may not
25 write down or memorialize any Protective Order Material(s). At the
26 conclusion of any meeting with the defendant, the member of the
27 Defense Team present shall take with him or her the Protective Order
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1 Material(s). At no time, under no circumstance, will any Protective
2 Order Material(s) be left in the possession, custody, or control of
3 the defendant, whether the defendant is incarcerated or not.

4 7. The Protective Order Material(s), including any copies,
5 may not be used, introduced, or otherwise relied upon, in any
6 proceeding by any person, except by the prosecution team at its
7 discretion or by defendant's counsel of record in this case in
8 hearings and proceedings in United States v. Johnathan Buma, CR No.
9 25-58-JVS (Central District of California) and any appeal or any
10 post-conviction collateral attack on any conviction or sentence
11 arising therefrom.

12 8. The Defense Team shall return all Protective Order
13 Material(s) to the United States Attorney's Office ("USAO") for the
14 Central District of California, certify that such materials have
15 been destroyed, or certify that such materials are being kept
16 pursuant to the California Business and Professions Code and the
17 Rules of Professional Conduct, at the conclusion of this case and
18 any appeal or post-conviction collateral attack on any conviction or
19 sentence arising therefrom.

20 9. Should the defendant change attorneys at any time before
21 the Protective Order Material(s) and all copies are returned to the
22 USAO, his former counsel will not provide the Protective Order
23 Material(s), including any copies, or disclose the contents of any
24 Protective Order Material(s) to any subsequent counsel unless
25 subsequent counsel for the defendant in this matter has agreed to in
26 writing, or has been ordered by the Court to, be bound by this
27 protective order. If subsequent counsel's consent to this Order
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1 cannot be obtained, defendant's former counsel will not provide any
2 Protective Order Material(s) to subsequent counsel.

3 10. Any papers to be filed with the Court on behalf of the
4 defendant that include Protective Order Material(s) or refer to the
5 contents of Protective Order Material(s) shall be filed under seal
6 unless the defendant obtains a) written agreement from the
7 government assenting to public filing, or b) an order of the Court.
8 Any papers to be filed with the Court by the government that include
9 Protective Order Material(s) or refer to the contents of Protective
10 Order Material(s) may be filed under seal in the government's
11 discretion.

12 11. Any papers to be filed with the Court in response to
13 papers filed in conformity with the preceding paragraph shall also
14 be filed under seal absent the written agreement of the opposing
15 party or an order of the Court.

16 12. Nothing in this Order will be construed so as to limit or
17 restrict the government's discovery obligations pursuant to Rule 16
18 of the Federal Rules of Criminal Procedure and Brady v. Maryland,
19 373 U.S. 83 (1963), or any other provision of law.

20 13. Nothing in this order shall be construed: (1) as a waiver
21 by the defendant to seek additional discovery beyond that provided
22 by the government; or (2) as a waiver of the defendant's right to
23 seek an unredacted version of any Protective Order Material(s); or
24 (3) as a waiver of the defendant's right to challenge whether a
25 specific document should be subject to this protective order.
26 Nothing in this order shall be construed as limiting the
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1 government's ability to object to those requests. In addition, the
2 parties reserve the right to seek future modifications of this
3 protective order.

4 IT IS SO STIPULATED.

BILAL A. ESSAYLI
Acting United States Attorney

5 DATED: Oct. 1, 2025

/s/ David T. Ryan

7 DAVID T. RYAN
Assistant United States Attorney
8 Chief, National Security Division

9 MENNO GOEDMAN
Trial Attorney
10 National Security Division

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA

13
14 DATED: Oct. 1, 2025

/s/Mark Geragos

15 MARK GERAGOS
ALEXANDRA KAZARIAN SETARA
16 QASSIM
Attorneys for Defendant
17 JOHNATHAN BUMA